

Message

From: Marian Rambelle [mrambelle@cdwconsultants.com]
Sent: 4/13/2016 4:36:57 PM
To: Harding, George [harding.george@epa.gov]
CC: 'COUTU Clary' [clary.coutu@keoliscs.com]; Bill Betters [bbetters@cdwconsultants.com]
Subject: Permit No. MA0003590 Notification Level exceedances

Dear George,

In accordance with NPDES Permit No. MA0003590 (Permit) for the Commuter Rail Maintenance Facility (CRMF) in Somerville, MA, and on behalf of our client, Keolis Commuter Services, LLC (Keolis), CDW Consultants, Inc. (CDW) would like to notify you of exceedances of the Permit's "notification levels" for several toxic pollutants in quarterly effluent samples collected at the facility. These samples were collected while Green Line Extension (GLX) construction project activities were taking place at CRMF (see below). The samples were collected of the discharge from the Prison Point oil/water separator (OWS), prior to discharge to the Millers River, on November 11, 2015 and February 3, 2016. Of note, additional "downstream" mitigation measures beyond those required by the Permit were installed and have been maintained by the GLX project at the Millers River outfall discharge since the spring of 2015.

"Notification levels" of the following parameters were exceeded in the quarterly samples:

	11/11/2015 concentration (ug/L)	2/3/2016 concentration (ug/L)
Copper (total)	<i>[Not exceeded]</i>	627
Lead (total)	548	914
Zinc (total)	1280	3110

As noted in previous DMR submittals, the GLX project has conducted stormwater piping maintenance (including pipe cleaning) and dewatering activities at CRMF beginning in the spring of 2015. Permit exceedances of several effluent limits have occurred since then and they have been attributed to the GLX project operations, as detailed in the September 21, 2015 notification letter submitted to you by co-permittees Massachusetts Bay Transportation Authority (MBTA) and Keolis. On November 9, 2015, an on-site meeting was held with you and representatives of Keolis, Keolis contractors, and GLX project contractors to inspect and discuss the status of NPDES permit requirements with respect to the current construction and future planned infrastructure changes. As a result, EPA determined that future permit exceedances related to the current construction should be regarded as the same condition, which is being addressed by the current mitigation at the Millers River, and that separate notifications of these future permit exceedances are no longer required.

The site conditions during these quarterly sampling events have not changed from those described in the September 21, 2015 notification letter and observed at the November 9, 2015 on-site meeting. As a result, we believe that these exceedances of "notification levels" are attributed to the GLX project operations and that notification of any future "notification level" exceedances during GLX project operations, if they occur, is not required. The GLX project operations at CRMF are expected to be completed in the spring of 2016.

Please let us know if you have any questions or comments.

Thanks,
Marian

Marian Rambelle
Senior Environmental Engineer

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